

1 PHILLIP A. TALBERT
United States Attorney
2 EMILY G. SAUVAGEAU
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
Facsimile: (916) 554-2900
5

6 Attorneys for Plaintiff
United States of America
7
8

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 ARNES KRAJINIC,
15 Defendant.

CASE NO. 2:23-CR-00074-DJC
STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER
DATE: October 5, 2023
TIME: 9:00 a.m.
COURT: Hon. Daniel J. Calabretta

16
17 **STIPULATION**

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
19 through defendant's counsel of record, hereby stipulate as follows:

20 1. By previous order, this matter was set for status on October 5, 2023.
21 2. By this stipulation, defendant now moves to continue the status conference until October
22 19, 2023, at 9:00 a.m., and to exclude time between October 5, 2023, and October 19, 2023, under Local
23 Code T4.
24 3. The parties agree and stipulate, and request that the Court find the following:
25 a) The government has represented that the discovery associated with this case
includes search warrants, photographs, audio recordings, and video recordings. All of this
26 discovery has been either produced directly to counsel and/or made available for inspection and
27 copying.

1 b) Counsel for defendant desires additional time to consult with his client regarding
2 discovery, to complete defense investigation, and otherwise prepare for trial.

3 c) Counsel for defendant believes that failure to grant the above-requested
4 continuance would deny him/her the reasonable time necessary for effective preparation, taking
5 into account the exercise of due diligence.

6 d) The government does not object to the continuance.

7 e) Based on the above-stated findings, the ends of justice served by continuing the
8 case as requested outweigh the interest of the public and the defendant in a trial within the
9 original date prescribed by the Speedy Trial Act.

10 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
11 et seq., within which trial must commence, the time period of October 5, 2023 to October 19,
12 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
13 T4] because it results from a continuance granted by the Court at defendant's request on the basis
14 of the Court's finding that the ends of justice served by taking such action outweigh the best
15 interest of the public and the defendant in a speedy trial.

16 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
17 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
18 must commence.

19 IT IS SO STIPULATED.

21 Dated: October 2, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ EMILY G. SAUVAGEAU

EMILY G. SAUVAGEAU
Assistant United States Attorney

27 Dated: October 2, 2023

/s/ DAVID FISCHER

DAVID FISCHER
Counsel for Defendant
ARNES KRAJINIC

1
2 **ORDER**
3

4
5 IT IS SO FOUND AND ORDERED this 2nd day of October, 2023.
6

7
8

9 /s/ Daniel J. Calabretta
10 THE HONORABLE DANIEL J. CALABRETTA
11 UNITED STATES DISTRICT JUDGE
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28